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February 11, 2022

**By ECF**

Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Donnell Bruns*, 21 Cr. 499 (PAE)

Your Honor:

I represent Donnell Bruns in the above-captioned case and I write with the government's and Pretrial Services' consent respectfully to request that Mr. Bruns' bond be modified from home detention to a curfew with the requirement that Mr. Bruns update the Court, Pretrial Services, and the government in 45 days about whether he is obtained and maintained employment.

On October 25, 2021, the Court permitted Mr. Bruns to switch from home incarceration to home detention to permit him to search for work. Dkt. 71. He worked with National Association for Drug Abuse Problems (NADAP), a program that helps people with drug problems obtain jobs, to connect with a temp agency hiring for employers like bakeries that had immediate needs to fill. Unfortunately, because the jobs came up on very short notice, Mr. Bruns was not able to get permission to travel to them consistent with his home detention; and in one instance, he was not able to receive the phone call because he ran out of money and his phone was turned off, which underscores why he so much wants to obtain work. We request the switch to curfew to give him more flexibility to accept jobs on little notice.

I conferred with AUSA Kedar Bhatia and Pretrial Officer Joshua Rothman, and they both consent to switching Mr. Bruns to a curfew with the obligation to report to the Court, Pretrial, and the government in 45 day whether he has obtained and maintained employment. The parties understand that Mr. Bruns will be switched back to curfew if he has not obtained and maintained employment.

For the foregoing reasons, I respectfully request that the Court endorse this letter to switch Mr. Bruns from home detention to curfew as described above.

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Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman  
Benjamin Silverman

cc: Counsel of record (by ECF)  
Pretrial Officer Joshua Rothman (by email)

**GRANTED.** The Clerk of Court is requested to terminate the motion at Dkt. No. 113.

SO ORDERED.

2/11/2022

  
PAUL A. ENGELMAYER  
United States District Judge